

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

ERNEST FLAGG, as Next Friend of  
JONATHAN BOND, a minor,

Plaintiff,

v

Case No.: 05-CV-74253  
Hon. Gerald E. Rosen  
Magistrate Judge R. Steven Whalen

CITY OF DETROIT, a municipal corporation;  
DETROIT POLICE CHIEF ELLA BULLY-CUMMINGS;  
DEPUTY DETROIT POLICE CHIEF CARA BEST;  
JOHN DOE POLICE OFFICERS 1-20; ASST.  
DEPUTY POLICE CHIEF HAROLD CURETON;  
COMMANDER CRAIG SCHWARTZ; POLICE LT.  
BILLY JACKSON; MAYOR KWAME M. KILPATRICK,  
CHRISTINE BEATTY, jointly and severally,

Defendants.

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NORMAN A. YATOOMA (P54746)  
ROBERT S. ZAWIDEH (P43787)  
NORMAN YATOOMA & ASSOCIATES, P.C.  
**Attorneys for Plaintiff**  
219 Elm Street  
Birmingham, MI 48009  
(248) 642-3600

JOHN A. SCHAPKA (P36731)  
CITY OF DETROIT LAW DEPARTMENT  
**Co-Counsel for Defendants**  
660 Woodward Avenue, Suite 1650  
Detroit, MI 48226  
(313) 224-4550

MAYER MORGANROTH (P17966)  
JEFFREY B. MORGANROTH (P41670)  
MORGANROTH & MORGANROTH, PLLC  
**Attorneys for Christine Beatty, Only**  
3000 Town Center, Suite 1500  
Southfield, MI 48075  
(248) 355-3084

KRYSTAL A. CRITTENDON (P49981)  
CITY OF DETROIT LAW DEPARTMENT  
**Attorney for City of Detroit, Harold Cureton  
and Craig Schwartz**  
660 Woodward Avenue, Suite 1650  
Detroit, MI 48226  
(313) 237-3018

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MORGANROTH  
&  
MORGANROTH,  
PLLC  
ATTORNEYS AT LAW

MICHIGAN OFFICE  
3000 TOWN CENTER  
SUITE 1500  
SOUTHFIELD, MI 48075  
(248) 355-3084  
FAX (248) 355-3017

NEW YORK OFFICE  
156 W. 56 STREET  
SUITE 1101  
NEW YORK, NY 10019  
(212) 586-5905  
FAX (212) 586-7302

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**DEFENDANT, CHRISTINE BEATTY'S, CONCURRENCE IN DEFENDANT CITY OF  
DETROIT'S AMENDED EMERGENCY MOTION TO STAY CIVIL PROCEEDINGS  
AND MOTION FOR ISSUANCE OF "GAG ORDER"**

NOW COMES Defendant, Christine Beatty (“Beatty”), by and through her attorneys, Morganroth & Morganroth, PLLC, and hereby states her concurrence with Defendant City of Detroit’s *Amended Emergency Motion to Stay Civil Proceedings and Motion for Issuance of “Gag Order”* as follows:

1. Beatty also filed her own Motion for Stay of Proceedings on April 7, 2008.
2. Beatty concurs and agrees that the instant civil proceedings should be stayed for the reasons set forth in the City of Detroit’s instant Motion as well as for the reasons set forth in her own Motion for Stay of Proceedings
3. Beatty also concurs and agrees that it would be appropriate for this Court to enter a narrowly tailored “gag order” relating exclusively to comments directly about this case for the reason set forth in the City’s Motion. Beatty further respectfully requests that any “gag order” should recognize and acknowledge that there are several other cases or matters, including, but not limited to, the Wayne County Criminal case, the Wayne County FOIA case, the Wayne County case filed by attorney O’Meara, and the Detroit City Council investigation, which deal with or involve overlapping issues that Plaintiff has made clear he intends to inject into this case and therefore any “gag order” should only restrict and limit comments made directly about this case.

MORGANROTH  
&  
MORGANROTH,  
PLLC  
ATTORNEYS AT LAW

MICHIGAN OFFICE  
3000 TOWN CENTER  
SUITE 1500  
SOUTHFIELD, MI 48075  
(248) 355-3084  
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WHEREFORE, Beatty respectfully requests that this Court grant the instant Motion as well as Beatty's Motion to Stay together with all other and further relief as is just and proper under the circumstances.

Respectfully submitted,

MORGANROTH & MORGANROTH, PLLC

By: /s/ Mayer Morganroth  
AYER MORGANROTH (P17966)  
JEFFREY B. MORGANROTH (P41670)  
JASON R. HIRSCH (P58034)  
Attorneys for Defendant Beatty  
3000 Town Center, Suite 1500  
Southfield, MI 48075  
(248) 355-3084

Dated: April 11, 2008

#### **CERTIFICATE OF SERVICE**

I hereby certify that on April 11, 2008, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

Norman Yatooma, Attorney.  
Kenneth L. Lewis, Attorney

John A. Schapka, Attorney  
Krystal A. Cittendon, Attorney

MORGANROTH & MORGANROTH, PLLC

By: /s/ Mayer Morganroth  
AYER MORGANROTH (P17966)  
Morganroth & Morganroth, PLLC  
3000 Town Center, Suite 1500  
Southfield, MI 48075  
(248) 355-3084  
E-mail: mmorganroth@morganrothlaw.com

Dated: April 11, 2008

MORGANROTH  
&  
MORGANROTH,  
PLLC  
ATTORNEYS AT LAW

MICHIGAN OFFICE  
3000 TOWN CENTER  
SUITE 1500  
SOUTHFIELD, MI 48075  
(248) 355-3084  
FAX (248) 355-3017

NEW YORK OFFICE  
156 W. 56 STREET  
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